

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re:

1121 PIER VILLAGE LLC, PENN
TREATY HOMES LLC, 2626
FRANKFORD LLC, 285 KINGSLAND
LLC, 231 E 123 LLC, 193 HANCOCK
LLC,

Debtors.

1121 PIER VILLAGE LLC, PENN
TREATY HOMES LLC, 2626
FRANKFORD LLC, 285 KINGSLAND
LLC, 231 E 123 LLC, 193 HANCOCK
LLC,

Plaintiffs,

vs.

SHARESTATES INTERCAP LINE, LLC,
SHARESTATES INVESTMENTS LLC,
ATLANTIS NATIONAL SERVICES, INC.,
RAYMOND DAVOODI, RADNI
DAVOODI, ALLEN SHAYANFEKR,

Defendants.

Chapter 11

Lead Case 21-11466 (ELF)

(Joint Administration Requested)

Adversary No. 21-00044-elf

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Raymond Davoodi and Radni Davoodi has filed their Motion to Dismiss Adversary Complaint with the court for dismissal of the above captioned adversary action.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before September 17, 2021 you or your attorney must do all of the following:

(a) file an answer explaining your position at

United States Bankruptcy Court

900 Market Street, Suite 400

Philadelphia, PA 19107

Telephone: (215) 408-2800

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

P. Brennan Hart, Esq
Kevin E. Raphael, Esq.
John W. Kettering, Esq
PIETRAGALLO GORDON ALFANO
BOSICK & RASPANTI, LLP
The Thirty-Eight Floor
One Oxford Centre
Pittsburgh, PA 15219

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on XX/XX/XX, at in Courtroom , United States Bankruptcy Court, (address of Bankruptcy Court).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office(s) in Philadelphia at 215-408-2800 or Reading at 610 208-5040 to find out whether the hearing has been canceled because no one filed an answer.

Date: August 27, 2021

/s/ John W. Kettering
P. Brennan Hart, Esq
Pa. I.D. No. 18123
Kevin E. Raphael, Esq.
Pa. I.D. No. 72673
John W. Kettering, Esq
Pa. I.D. No. 316945
PIETRAGALLO GORDON ALFANO
BOSICK & RASPANTI, LLP
The Thirty-Eight Floor
One Oxford Centre
Pittsburgh, PA 15219

PBH@pietragallo.com
KER@pietragallo.com
JK@pietragallo.com